## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION FUND AND WELFARE FUNDS,	)
Plaintiff,	)
V.	) No. 07 C 4138
	) Judge Kennelly
SCHLIPF TRUCKING INCORPORATED an Illinois corporation	) Magistrate Judge Mason )
Defendant.	)

## MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS

OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its
attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move
for entry of a default judgment in sum certain as stated in this Complaint and the supporting
Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on July 29, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- 2. Corporate service was made upon SCHLIPF TRUCKING INCORPORATED, an Illinois corporation not in good standing, on August 9, 2007 and a copy of the proof of service was filed with the court on August 29, 2007.
- 3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$824.60 Pension \$1,383.20 Welfare \$925.00 Attorneys fees \$394.50 Court costs \$3,527.30 WHEREFORE, Plaintiff prays for the entry of judgment against Defendant,
SCHLIPF TRUCKING INCORPORATED, an Illinois corporation and in favor of
Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS
WELFARE AND PENSION FUNDS in the amount of \$3,527.30.

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS

By:

One of Its Attorneys

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